

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DEIRDRE LEANE AND IPNAV, LLC ,

Plaintiffs,

v.

**UNIFIEDONLINE, INC and
CHANBOND, LLC,**

Defendants.

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Civil Action No. 3:20-cv-03097-B

THE PARTIES' JOINT EXHIBIT LIST, AND PLAINTIFFS' EXHIBIT LIST

Pursuant to the Court's *Order*, Doc. 27 at 2, Plaintiffs Deirdre Leane and IPNAV, LLC (collectively, "Plaintiffs") hereby file and submit the *Parties' Joint Exhibit List, and Plaintiffs' Exhibit List*, identifying documents that may be offered by the Parties and Plaintiffs, respectively, at the November 4, 2020 TRO and preliminary injunction hearing:¹

<u>JOINT EXHIBIT</u>	<u>DESCRIPTION</u>	<u>REFERENCE</u>	<u>PAGE NUMBERS</u>
1.	Original Verified Petition with Attachments	Joint Exhibit 1	JOINT EX. 001- 085
2.	Arbitration Demand	Joint Exhibit 2	JOINT EX. 086 - 155
3.	Patent Purchase Agreement and Exhibits	Joint Exhibit 3	JOINT EX. 156 - 209
4.	Interest Sales Agreement and Exhibits	Joint Exhibit 4	JOINT EX. 210 - 244
5.	Advisory Services Agreement ("ASA") and Exhibits	Joint Exhibit 5	JOINT EX. 245 - 257
6.	Termination Agreement	Joint Exhibit 6	JOINT EX. 258
7.	10-28-2015 Watkins email with attachment	Joint Exhibit 7	JOINT EX. 259 - 285
8.	1-8-2020 to 2-17-2020 Text Messages	Joint Exhibit 8	JOINT EX. 286 - 288

¹ Plaintiffs and Defendants' counsel conferred regarding Joint Exhibits 1-9. Defendants' counsel stipulated to the admission of these exhibits with the following clarification: Defendants' counsel does not agree to the admission of Joint Exhibits 1-2 for the truth thereof.

<u>JOINT EXHIBIT</u>	<u>DESCRIPTION</u>	<u>REFERENCE</u>	<u>PAGE NUMBERS</u>
9.	Carter-Woung email	Joint Exhibit 9	JOINT EX. 289 - 290

<u>PLAINTIFFS' EXHIBIT</u>	<u>DESCRIPTION</u>	<u>REFERENCE</u>	<u>PAGE NUMBERS</u>
1.	4-30-2018 Text Messages	Plaintiffs' Exhibit 1	PLAINTIFFS' EX. 001
2.	10-4-2019 Text Messages	Plaintiffs' Exhibit 2	PLAINTIFFS' EX. 002
3.	10-16-2019 Text Messages	Plaintiffs' Exhibit 3	PLAINTIFFS' EX. 003
4.	10-23-2019 Text Messages	Plaintiffs' Exhibit 4	PLAINTIFFS' EX. 004
5.	10-24-19 Text Messages	Plaintiffs' Exhibit 5	PLAINTIFFS' EX. 005 - 006
6.	Waterfall email with Attachments	Plaintiffs' Exhibit 6	PLAINTIFFS' EX. 007 - 008
7.	9-13-2017 email with ASA attached	Plaintiffs' Exhibit 7	PLAINTIFFS' EX. 009 - 026
8.	Vandewegh Check	Plaintiffs' Exhibit 8	PLAINTIFFS' EX. 027
9.	Carter Deposition Transcript	Plaintiffs' Exhibit 9	PLAINTIFFS' EX. 028 - 087
10.	10-8-2020 email to Carter	Plaintiffs' Exhibit 10	PLAINTIFFS' EX. 088

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Respectfully submitted,

/s/ J. Sean Lemoine

J. Sean Lemoine

Texas State Bar No. 24027443

sean.lemoine@wickphillips.com

WICK PHILLIPS, LLP

3131 McKinney Ave., Suite 100

Dallas, Texas 75204

Telephone: 214-692-6200

Facsimile: 214-692-6255

-and-

Akiva M. Cohen

Pro Hac Vice

aochen@kusklaw.com

Kamerman, Uncyk, Soniker & Klein PC

1700 Broadway

New York, NY 10019

Telephone: 212-400-4390

Facsimile: 866-221-6122

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

On November 2, 2020, a conference was held between Akiva M. Cohen (counsel for the Plaintiffs) and Linda Stahl (counsel for the Defendants). Defendants consent to admission of Joint Exhibits 1-9 above, with the clarifications noted in footnote 1.

/s/ J. Sean Lemoine

J. Sean Lemoine

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2020, a true and correct copy of the foregoing documents was served through the Court's CM/ECF System on all counsel of record.

/s/ J. Sean Lemoine

J. Sean Lemoine